

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS WELFARE AND)
PENSION FUNDS,)

Plaintiffs,)

v.)

SWEET LOU TRUCKING, INC.,)
an Illinois corporation)

Defendant.)

Case No.: 2015 C 10809

Judge Sharon Johnson Coleman

Magistrate Judge Rowland

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on December 2, 2015 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon SWEET LOU TRUCKING, INC., an Illinois corporation was made on the Defendant on January 6, 2016 and a copy of the proof of service was filed with the court on January 13, 2016.
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$2,744.23	Pension
\$2,526.96	Welfare
\$925.00	Attorneys fees
<u>\$578.00</u>	Court costs
\$6,774.19	

WHEREFORE, Plaintiffs pray for:

1. Entry of judgment against Defendant, SWEET LOU TRUCKING, INC., an Illinois corporation, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION AND WELFARE FUNDS in the amount of \$6,774.19

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS PENSION AND
WELFARE FUNDS

s/John J. Toomey
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Dated: March 21, 2016